

Table 1. Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements																			
of the NESHAP for the Pulp and Paper Production Source Category -- Process Operations																			
		# pulping lines	(A)	(B)	(C)	(D)	(E)	(F)											
		# bleaching lines	Number of	EPA	Tech	Management	Clerical	EPA											
		# mills total	Respondents	Hours	Hours	Hours	Hours	Cost											
		# mills with bleaching lines	Per Year (a)	Per	Per Year	Per Year	Per Year	Per Year											
				Respondent	@ \$28.08	@ \$51.95	@ \$20.85												
Burden Item					(C=AxB)	(D=Cx0.05)	(E=Cx0.1)												
1.	Applications																		
2.	Surveys and Studies																		
3.	Reporting Requirements																		
	A. Read and Understand Rule Requirements		1 b	40	40	2	4	\$1,310											
	B. Required Activities																		
	Initial performance tests:																		
	1.1) Pulping processes (Non-Sulfite) - Choice of:																		
	a) Review Documentation that vent streams are introduced to		5 bc	8	40	2	4	\$1,310											
	the flame zone of a boiler, lime kiln, or recovery furnace, or																		
	b) Review documentation that the control incinerator is operating		1 b d	8	8	0	1	\$262											
	at a level of at least 1600 F and 0.75 sec residence time, or																		
	c) Review performance test of control device		1 b d	8	8	0	1	\$262											
	1.2) Pulping Processes (Sulfite)		1 be	8	8	0	1	\$262											
	-Review performance test of control device																		
	2.1) Bleaching process vent scrubber (MACT I Mills) - Choice of																		
	a) Review documentation of scrubber operating parameters		4 bg	8	32	2	3	\$1,048											
	b) Review performance test of control device		0 bf	8	0	0	0	\$0											
	2.2) Bleaching process vent scrubber (MACT III Mills) - Choice of																		
	a) Review documentation of scrubber operating parameters		0 bg	8	0	0	0	\$0											
	b) Review performance test of control device		0 bf	8	0	1	0	\$52											
	3.1) Pulping wastewater treatment system (Non-Sulfite) - Choice of:																		
	a) Review performance test of condensate segregation and control device, or		4 bg	8	32	2	3	\$1,048											
	b) Review performance test of biotreatment unit		40 bg	8	320	16	32	\$10,484											
	3.2) Pulping wastewater treatment (Sulfite)																		
	-Review performance test of control device		1 bg h	8	8	0	1	\$262											
	Review repeat performance tests																		
	1) test method 308 - pulping		0 bi	4	0	0	0	\$0											
	2) test method 26A - bleaching		0 bi	4	0	1	1	\$73											
	3) test method 305 - kraft pulping wastewater		1 bi	4	4	0	0	\$131											
	4) test method 304 - kraft pulping wastewater		0 bi	4	0	0	0	\$0											
	5) test method 305 - sulfite pulping wastewater		0 bi	4	0	1	0	\$52											
	Initial/Annual inspection (enclosures, closed vent, wastewater conveyance system)- test method 21		103 j	0	0	0	0	\$0											
	Monthly visual inspection of enclosures, closed vent system, and wastewater conveyance system.		155 k	0	0	0	0	\$0											

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	b) Performance test of scrubber or control device	24	1	\$10,000	24	0	c,g, j	0	0	0	\$0	
	- test method 26A											
	2.2) Bleaching process vent scrubber (MACT III Mills) - Choice of											
	a) Provide documentation of scrubber operating parameters,	60	1	\$0	60	0	c,j	0	0	0	\$0	
	or previous performance test results, or											
	b) Performance test of scrubber or control device	24	1	\$10,000	24	0	c,g, j	0	0	0	\$0	
	- test method 26A											
	3.1) Pulping wastewater treatment (Non-Sulfite)											
	a) Performance test of condensate segregation and	24	1	\$16,000	24	4	c,h, k	96	5	10	\$7,044	
	control device (test method 305), or											
	b) Performance test of biotreatment unit - test method 304	24	1	\$11,000	24	2	c,h, l	48	2	5	\$3,522	
	3.2) Pulping wastewater treatment (Sulfite)											
	Performance test of control device - test method 305	24	1	\$16,000	24	0	c,h, m	0	0	0	\$0	
	Repeat of performance test											
	1) test method 308 - pulping	24	1	\$14,000	24	0	c,g, n	0	0	0	\$0	
	2) test method 26A - bleaching	24	1	\$10,000	24	0	c,g, n	0	0	0	\$0	
	3) test method 305 - kraft pulping ww	24	1	\$16,000	24	1	c,h, n	24	1	2	\$1,761	
	4) test method 304 - kraft pulping ww	24	1	\$11,000	24	0	c,h, n	0	0	0	\$0	
	5) test method 305 - sulfite pulping ww	24	1	\$16,000	24	0	c,h, n	0	0	0	\$0	
	Initial/Annual inspection (enclosures, closed vent, wastewater conveyance system)- test method 21	8	1	\$3,000	8	87	o	696	35	70	\$51,069	
	Monthly visual inspection of enclosures, closed vent system, and wastewater conveyance system.	4	12	\$0	48	130	d	6,240	312	624	\$457,860	
C	Create Information	Included in 3.B										
D	Gather Information	Included in 3.B										
E	Report Preparation											
	Initial Notification Report	16	1	\$0	16	0	c,d	0	0	0	\$0	<45 day after promul.
	Notification of compliance status	16	1	\$0	16	0	c,d	0	0	0	\$0	
	Initial Compliance Strategy Report	40	1	\$0	40	0	c,p	0	0	0	\$0	
	Compliance Strategy Report Update	16	1	\$0	16	27	p	432	22	43	\$31,698	
	Semi-annual summary report	16	2	\$0	32	137	d	4,384	219	438	\$321,676	
	Continuous monitoring/Exceedance reports	24	2	\$0	48	21	q	1,008	50	101	\$73,962	
	Notification of performance test	4	1	\$0	4	24	c,r	96	5	10	\$7,044	>75 day before test
	Notification of construction/reconstruction	4	1	\$0	4	21	c,s	84	4	8	\$6,164	>180day beforehand
	Notification of actual startup	4	1	\$0	4	21	c,s	84	4	8	\$6,164	<150 day after startup
4.	Recordkeeping Requirements											
A	Read Instructions	Included in 3.A										
B	Plan Activities	Included in 3.B										
C	Implement Activities	Included in 3.B										
D	Develop Record System	40	1	\$0	40	0	c,d	0	0	0	\$0	
E	Record information											
	Records of continuous monitoring for operating parameters	2	52	\$0	104	137	d	14,248	712	1,425	\$1,045,447	
	Records of periodic inspections (monthly visual inspections and annual method 21)	Included in 3.B										
	Record startups, shutdowns, and malfunctions	4	12	\$0	48	137	d	6,576	329	658	\$482,514	

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